

1 2 3 4 5 6 7 8 9 10	ANDREW P. GORDON (NSBN 3421) KRISTEN T. GALLAGHER (NSBN 9561) McDONALD CARANO WILSON LLP 2300 W. Sahara Ave., Suite 1000 Telephone: 702.873.4100 Facsimile: 702.873.9966 Las Vegas, NV 89102 agordon@mcdonaldcarano.com kgallagher@mcdonaldcarano.com NANCY J. SENNETT (admitted pro hac vice) DAVID M. LUCEY (admitted pro hac vice) BRIAN P. KEENAN (admitted pro hac vice) FOLEY & LARDNER LLP 777 East Wisconsin Avenue Milwaukee, WI 53202-5306 bcothroll@foley.com nsennett@foley.com Attorneys for Defendants	DON SPRINGMEYER (NSBN 1021) WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP 3556 East Russell Road, Second Floor Las Vegas, NV 89120 Phone: (702) 341-5200 JONATHAN H. WALLER (NSBN 5538) WOLF, RIFKIN, SHAPIRO, SCHULMAN & RABKIN, LLP 1400 Park Place Tower 2001 Park Place North Birmingham, Alabama 35203 PETER McNULTY McNULTY LAW FIRM 827 Moraga Drive Bel Aire, California 90049 Phone: (818) 223-9292
12		Attorneys for Plaintiffs
13	IN THE UNITED OF AT	TES DISTRICT COURT
14		
15	FOR THE DISTR	ICT OF NEVADA
16	ION BAROI, CRAIG WASSERMAN, and MARK SCHECHTER et al.,	Case No.: 2:09-cv-00671-PMP-GWF
17	Plaintiffs,	This Document Relates to: All Actions
18	VS.	STIPULATION AND ORDER TO EXTEND DEFENDANTS' TIME TO
19	PLATINUM CONDOMINIUM DEVELOPMENT, LLC, MARCUS	RESPOND TO PLAINTIFFS' MOTIONS: 1) MOTION FOR RECONSIDERATION
20	HOTELS, INC., and MARCUS MANAGEMENT LAS VEGAS, LLC,	ÓF RULING DISMISSING PLAINTIFFS' STATE SECURITIES CLAIMS BASED
21	Defendants.	UPON STATUTE OF LIMITATIONS AND
22		2) MOTION TO CLARIFY AND FOR RECONSIDERATION GRANTING
23		PARTIAL SUMMARY JUDGMENT TO CERTAIN PLAINTIFFS
24		(First Request)
25		, ,
26	Pursuant to LR 7-1, the parties hereby	y stipulate and agree that Defendants' time to
27	respond to the Plaintiffs' Motion for Reconsid	deration of Ruling Dismissing Plaintiffs' State
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1 Securities Claims Based Upon Statute of Limitations (Dkt. # 238) and Motion to Clarify and 2 for Reconsideration Granting Partial Summary Judgment to Certain Plaintiffs (Dkt. #241) 3 ("Motions") shall be extended to August 31, 2012. The parties request the extension because 4 the Defendants will be submitting a consolidated opposition to the Motions. Given the similar 5 issues raised in the Motions, the Defendants believe it will be more efficient for the Defendants 6 to respond to them at the same time in one filing. The Defendants have no objection to the 7 Plaintiffs submitting separate reply briefs on each motion should they choose to do so. 8 RESPECTFULLY SUBMITTED. 9 DATED this 17th day of August, 2012. DATED this 17th day of August, 2012. 10 s/ Don Springmeyer s/ Brian P. Keenan Don Springmeyer (NSBN 1021) Nancy J. Sennett 11 Wolf, Rifkin Shapiro Schulman & Rabkin, Brian P. Keenan 12 LLP Folev & Lardner LLP 3556 East Russell Road 777 East Wisconsin Avenue 13 Milwaukee, WI 53202-5306 Second Floor Las Vegas, NV 89120 Phone: (414) 271-2400 14 Phone: (702) 341-5200 Fax: (414) 297-4900 Fax: (702) 341-5300 bcothroll@foley.com 15 dspringmeyer@wrslawyers.com nsennett@foley.com 16 (admitted pro hac vice) Jonathan H. Waller (NSBN 5538) 17 Wolf, Rifkin, Shapiro, Schulman & Rabkin, Andrew P. Gordon (NSBN 3421) LLP Kristen T. Gallagher (NSBN 9561) 18 McDonald Carano & Wilson LLP 1400 Park Place Tower 19 2001 Park Place North 2300 West Sahara Avenue, Suite 1000 Birmingham, Alabama 35203 Las Vegas, NV 89102 20 Phone: (702) 873-4100 Fax: (702) 873-9966 Peter Mcnulty 21 Mcnulty Law Firm agordon@mcdonaldcarano.com 827 Moraga Drive kgallagher@mcdonaldcarano.com 22 Bel Aire, California 90049 23 Counsel for Defendants Counsel for Plaintiffs 24 /// 25 /// 26 /// 27 /// 28

1	ORDER
2	IT IS SO ORDERED: Phy M. On-
3	United States Magistrate Judge
4	August 21 2012
5	DATED: August 31, 2012
6	
7	Respectfully submitted by:
9	FOLEY & LARDNER LLP
10	s/ Brian P. Keenan
11	Nancy J. Sennett
12	Brian P. Keenan
13	777 East Wisconsin Avenue Milwaukee, Wisconsin 53202
14	Phone: (414) 271-2400 Fax: (414) 297-4900
15	nsennett@foley.com bkeenan@foley.com
16	
17	Andrew P. Gordon Kristen T. Gallagher
18	McDonald Carano & Wilson LLP 2300 West Sahara Avenue, Suite 1000
19	Las Vegas, NV 89102
20	Phone: (702) 873-4100 Fax: (702) 873-9966
21	agordon@mcdonaldcarano.com kgallagher@mcdonaldcarano.com
22	Counsel for Defendants
23	Counsel for Defendants
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1	CERTIFICATE OF SERVICE	
2	I hereby certify that I am an employee of Foley & Lardner LLP, and that I served a true and	
3	correct copy of the foregoing STIPULATION AND ORDER TO EXTEND	
4	DEFENDANTS' TIME TO RESPOND TO PLAINTIFFS' MOTION FOR	
5	RECONSIDERATION OF RULING DISMISSING PLAINTIFFS' STATE	
6		
7	SECURITIES CLAIMS BASED UPON STATUTE OF LIMITATIONS AND PLAINTIFFS' MOTION TO CLARIFY AND FOR RECONSIDERATION GRANTIN	
8		
9	PARTIAL SUMMARY JUDGMENT, on this 17th day of August, 2012 via the Court's EC	
10	system, which will serve notice of the above, upon the following:	
11	Peter McNulty Jonathan H. Waller	
12	Peter McNulty Jonathan H. Waller McNulty Law Firm Wolf, Rifkin, Shapiro, Schulman & 827 Moraga Drive Rabkin, LLP	
13	Bel Aire, CA 90049 Bel Aire, CA 90049 1400 Park Place Tower 2001 Park Place North	
14	Birmingham, AL 35203	
15		
16	Don Springmeyer Wolf, Rifkin, Shapiro,	
17	Schulman & Rabkin, LLP 3556 E. Russell Road, 2 nd Floor	
18	Las Vegas, NV 89120	
19	s/ Brian P. Keenan	
20	An employee of Foley & Lardner LLP	
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